



3. According to the Complaint, this is a motor vehicle product liability action alleging severe personal injuries and death resulting from an accident involving a Ford Explorer. The Complaint alleges that the Ford Explorer was defectively designed and manufactured, resulting in severe personal injuries to the Plaintiff. As a result of the defendant's alleged negligence, Plaintiff claims she suffered serious and permanent bodily injuries in a rollover accident involving a Ford Explorer.

4. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.00.

5. The plaintiff is a resident of Quincy, Massachusetts.

6. Ford is a Delaware corporation with its principal place of business in Dearborn, Michigan.

7. Jurisdiction is founded on diversity of citizenship between the parties pursuant to 28 U.S.C. § 1332. The amount in controversy, given Plaintiff's alleged damages, exceeds \$75,000.00.

8. This Notice of Removal is being filed within the time period required by 28 U.S.C. § 1446(b).

9. This Notice of Removal was served on counsel of record via regular mail on November 14, 2003 pursuant to 28 U.S.C. § 1446(d).

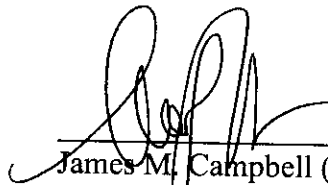
11. A true and correct copy of this Notice of Removal was filed via regular mail on November 14, 2003 with the Clerk of the Suffolk Superior Court.

WHEREFORE, Ford Motor Company prays for removal of the above-captioned matter from the Suffolk Superior Court, Suffolk County, Commonwealth of Massachusetts, to the United States District Court for the District of Massachusetts.

FORD MOTOR COMPANY,

By Its Attorneys,

CAMPBELL CAMPBELL EDWARDS  
& CONROY, P.C.



James M. Campbell (BBO # 541882)

Mark J. Hoover (BBO # 564473)

Sara K. Thompson (BBO# 648258)

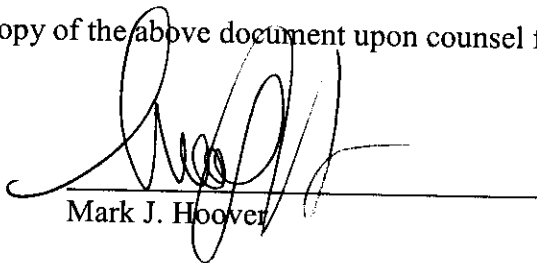
One Constitution Plaza

Boston, MA 02129

(617) 241-3000

**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the above document upon counsel for all parties by mail on November 14, 2003



Mark J. Hoover